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May 14, 2024

VIA ECF & HAND DELIVERY

Hon. Christopher J. Burke
U.S. District Court for the District of Delaware
844 N. King Street
Unit 28, Room 2325
Wilmington, DE 19801-3555

Re: ***loanDepot.com, LLC v. Movement Mortgage, LLC,***
C.A. No. 23-0681-MN

Dear Judge Burke:

Per the Court's Oral Order of May 13, 2024 (D.I. 64) referring discovery disputes in the above-referenced matter to Your Honor, the parties write to request the scheduling of a discovery dispute teleconference and letter briefing with respect to the parties' discovery disputes. The parties will thereafter submit the Joint Motion as directed by the Court.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (by telephone) on May 6, 2024.

- For Plaintiff:
 - Delaware Counsel: Anderw L. Cole (Cole Schotz P.C.)
 - Lead Counsel: Matthew J. Hank, Thomas W. Carroll, Camellia Campanelli (Littler Mendelson, P.C.)
- For Defendants:
 - Delaware Counsel: Lauren DeLuca (Connolly Gallagher LLP)
 - Lead Counsel: Ari Karen, Corinne Bahner, Lucas Markowitz (Mitchell Sandler LLC)



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The disputes requiring judicial attention are as follows:

- Defendant's Motion to Compel Deposition of John Bianchi / Plaintiff's Motion for Protective Order on the Deposition of John Bianci based on the Apex Doctrine
- Defendant's Motion for Protective Order to Quash Depositions of Mike Brennan, Jason Stenger, and Alison Dresnek / Plaintiff's Motion to Compel the Depositions of same
- Defendant's Motion to Compel Production of Documents prior to 30(b)(6) Deposition
- Plaintiff's Motion to compel responses to subpoenas to third parties represented by Defendant's counsel / Third Parties' Motion for Protective Order
- Plaintiff's discovery motion pursuant to Rule 32(a)(1)(A) regarding use of deposition transcript of Chris Shelton

Respectfully submitted,

/s/ Lauren P. DeLuca

Lauren P. DeLuca (#6024)

cc: All counsel of record (via ECF)